

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Eric Watson d/b/a Jookrs Hulk	)	CASE NO. <u>21-cv-1622-RSM</u>
Hauling & Salvage Services	)	COMPLAINT FOR A CIVIL CASE
Sarah Watson d/b/a Jookrs Hulk	)	ALLEGING BREACH OF
Hauling & Salvage Services	)	CONTRACT, THEFT, FRAUD,
	)	EXTORTION, HATE CRIME,
Plaintiffs,	)	BAD FAITH
	)	(28 U.S.C. ss 1332, Diversity of
VS.	)	Citizenship)
Mike Roff d/b/a Latitude Marine Services	)	Request Expedited
KJ Roff d/b/a Latitude Marine Services	)	Jury Trial: YES
Chrisi Dite d/b/a Latitude Marine Services	)	
Service writer. Bob Cornelius d/b/a/ Latitude)	)	
Marine Services service writer.	)	
	)	
Defendants.	)	
	)	

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I. THE PARTIES TO THIS COMPLAINT

A. Plaintiffs

Eric Watson and Sarah Watson  
7807 Kapowsin Hwy E  
Graham, WA 98338  
Pierce County  
253 380 0720

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1 B. Defendant(s)

2       Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

4       Defendant No. 1

Name	Mike Roff
Job or Title (if known)	Latitude Marine Service (CEO)
Street Address	18578 Mcglinn Island Ln
City and County	La Conner, Skagit
State and Zip Code	WA 98257
Telephone Number	360-466-4905

10      Defendant No. 2

Name	KJ Roff
Job or Title (if known)	Latitude Marine Service (President)
Street Address	18578 Mcglinn Island Ln
City and County	La Conner, Skagit
State and Zip Code	Wa 98257
Telephone Number	360-466-4905

16      Defendant No. 3

Name	Chrisi Dite
Job or Title (if known)	Lattiude Marine Service (service writer)
Street Address	18578 Mcglinn Island Ln
City and County	La Conner, Skagit
State and Zip Code	WA 98257
Telephone Number	360-466-4905

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**Defendant No. 4**

Name	<b>Bob Cornelius</b>
Job or Title ( <i>if known</i> )	<b>Latitude Marine Service (Service writer)</b>
Street Address	<b>18578 Mcglinn Island Ln</b>
City and County	<b>La Conner, Skagit</b>
State and Zip Code	<b>WA 98257</b>
Telephone Number	<b>360-466-4905</b>

## **II. BASIS FOR JURISDICTION**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question       Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

#### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

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1      B.     If the Basis for Jurisdiction Is Diversity of Citizenship

2            1.     The Plaintiff(s)

3                a.    If the plaintiff is an individual.

4     The plaintiff (name) \_\_\_\_\_, is a citizen of the

5     State of (name) \_\_\_\_\_.

6                b.    If the plaintiff is a corporation.

7     The plaintiff, (name) **Eric Watson**, is incorporated under

8     the laws of the State of (name) **Washington**, is incorporated under

9     the laws of the State of (name) **Washington**, and has its principal

10    place of business in the State of (name) **Washington**.

11    *(If more than one plaintiff is named in the complaint, attach an additional page providing  
the same information for each additional plaintiff.)*

13            2.     The Defendant(s)

14                a.    If the defendant is an individual.

15     The defendant, (name) \_\_\_\_\_, is a citizen of the

16     State of (name) \_\_\_\_\_. Or is a citizen of

17     (foreign nation) \_\_\_\_\_.

18                b.    If the defendant is a corporation.

19     The defendant, (name) **Mike Roff**, is incorporated under

20     the laws of the State of (name) **Washington**, and has its principal

21    place of business in the State of (name) **Washington**.

22     Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,

23    and has its principal place of business in (name) \_\_\_\_\_.

24    *(If more than one defendant is named in the complaint, attach an additional page  
providing the same information for each additional defendant.)*

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1 B. If the Basis for Jurisdiction Is Diversity of Citizenship

2 1. The Plaintiff(s)

3 a. If the plaintiff is an individual.

4 The plaintiff (name) \_\_\_\_\_, is a citizen of the

5 State of (name) \_\_\_\_\_.

6 b. If the plaintiff is a corporation.

7 The plaintiff, (name) **Sarah Watson** \_\_\_\_\_, is incorporated under

8 the laws of the State of (name) **Washington** \_\_\_\_\_, is incorporated under

9 the laws of the State of (name) **Washington** \_\_\_\_\_, and has its principal

10 place of business in the State of (name) **Washington** \_\_\_\_\_.

11 (If more than one plaintiff is named in the complaint, attach an additional page providing  
the same information for each additional plaintiff.)

13 2. The Defendant(s)

14 a. If the defendant is an individual.

15 The defendant, (name) \_\_\_\_\_, is a citizen of the

16 State of (name) \_\_\_\_\_. Or is a citizen of

17 (foreign nation) \_\_\_\_\_.

18 b. If the defendant is a corporation.

19 The defendant, (name) **Kj Roff** \_\_\_\_\_, is incorporated under

20 the laws of the State of (name) **Washington** \_\_\_\_\_, and has its principal

21 place of business in the State of (name) **Washington** \_\_\_\_\_.

22 Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,

23 and has its principal place of business in (name) \_\_\_\_\_.

24 (If more than one defendant is named in the complaint, attach an additional page  
providing the same information for each additional defendant.)

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1      B.     If the Basis for Jurisdiction Is Diversity of Citizenship

2            1.     The Plaintiff(s)

3                a.    If the plaintiff is an individual.

4     The plaintiff (name) \_\_\_\_\_, is a citizen of the

5     State of (name) \_\_\_\_\_.

6                b.    If the plaintiff is a corporation.

7     The plaintiff, (name) \_\_\_\_\_, is incorporated under

8     the laws of the State of (name) \_\_\_\_\_, is incorporated under

9     the laws of the State of (name) \_\_\_\_\_, and has its principal

10    place of business in the State of (name) \_\_\_\_\_.

11    *(If more than one plaintiff is named in the complaint, attach an additional page providing  
the same information for each additional plaintiff.)*

13            2.     The Defendant(s)

14                a.    If the defendant is an individual.

15    The defendant, (name) \_\_\_\_\_, is a citizen of the

16    State of (name) \_\_\_\_\_. Or is a citizen of

17    (foreign nation) \_\_\_\_\_.

18                b.    If the defendant is a corporation.

19    The defendant, (name) **Chrisi Dite** \_\_\_\_\_, is incorporated under

20    the laws of the State of (name) **Washington** \_\_\_\_\_, and has its principal

21    place of business in the State of (name) **Washington** \_\_\_\_\_.

22    Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,

23    and has its principal place of business in (name) \_\_\_\_\_.

24    *(If more than one defendant is named in the complaint, attach an additional page  
providing the same information for each additional defendant.)*

Pro Se 4 2016

1 B. If the Basis for Jurisdiction Is Diversity of Citizenship

2 1. The Plaintiff(s)

3 a. If the plaintiff is an individual.

4 The plaintiff (name) \_\_\_\_\_, is a citizen of the

5 State of (name) \_\_\_\_\_.

6 b. If the plaintiff is a corporation.

7 The plaintiff, (name) \_\_\_\_\_, is incorporated under

8 the laws of the State of (name) \_\_\_\_\_, is incorporated under

9 the laws of the State of (name) \_\_\_\_\_, and has its principal

10 place of business in the State of (name) \_\_\_\_\_.

11 *(If more than one plaintiff is named in the complaint, attach an additional page providing  
the same information for each additional plaintiff.)*

13 2. The Defendant(s)

14 a. If the defendant is an individual.

15 The defendant, (name) \_\_\_\_\_, is a citizen of the

16 State of (name) \_\_\_\_\_. Or is a citizen of

17 (foreign nation) \_\_\_\_\_.

18 b. If the defendant is a corporation.

19 The defendant, (name) **Bob Cornelius** \_\_\_\_\_, is incorporated under

20 the laws of the State of (name) **Washington** \_\_\_\_\_, and has its principal

21 place of business in the State of (name) **Washington** \_\_\_\_\_.

22 Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,

23 and has its principal place of business in (name) \_\_\_\_\_.

24 *(If more than one defendant is named in the complaint, attach an additional page  
providing the same information for each additional defendant.)*

Complaint for a civil case alleging breach  
of contract -1

The plaintiff has complied with the Plaintiff's obligations and the contract.

**REASON FOR THIS COMPLAINT**

Plaintiffs Eric Watson and Sarah Watson, a married couple who own a small business, Jookrs Hulk Hauling & Salvage Services. They bought a rare one of a kind, 1962 Chris Craft 50 foot Constellation. It has 10 holes in the bottom and made arrangements with Associated Boat Transport, to move the boat, for covered storage at Latitude Marie Services. Verbal Agreement was created by Jay Mckittrick, the manager of Latitude Marine Services at that time. No Deposit, no insurance and the rent paid for monthly dry storage would be required. When Plaintiffs would like to start work was after a Survey was completed after September 18<sup>th</sup>, 2020. The boat was delivered and readied to work on in dry storage. The Breach of Contract was deliberate and intentionally done as a Hate Crime by Owner Mike Roff, President KJ Roff, Bob Cornelius, Jay Mckittrick, Chrisi Dite. Each taking equal participation in this by causing, creating, assisting, each other in their duty to attempt to extort the Plaintiff's Eric and Sarah Watson their money without any factual reason and use lies to create an illusion. The illusion created delays in which to use up Plaintiff's prepaid rent money for covered storage. Mike Roff, the owner of Latitude Marine Services stepped further in this matter January of 2021 to remove the boat from dry/covered storage and put it outside where nature has caused more damage to the boat by rain entering the holes in the top of the boat saturating the electrical panels and other unseen damages. Bob Cornelius, a manager of Latitude Marine Services refused to allow Plaintiff Sarah Watson to go onto the boat to attempt to cover the boat with a 40 foot by 60 foot tarp to protect the boat. Plaintiff Sarah Watson called the Law

Enforcement for assistance and they refused to help. They claimed it was a civil issue and they can not get involved. Plaintiff Sarah Watson was only allowed to take photos of the boat and told to leave. Is this the way to treat a paying customer with intent to protect their investment. Mike Roff attempted to extort \$10,000.00 from the Plaintiffs in writing by demanding \$10,000.00 deposit for crushing the boat at his convenience. Mike Roff further hiked up the price of repair to create an unreasonable cost to the Plaintiffs so no work could be afforded. Mike Roff then agreed if Plaintiff purchased the needed materials for he would discount the cost. When Plaintiffs purchased the materials and notified Mike Roff and KJ Roff they wanted to bring the materials up, Mike Roff replied do not bring the materials to this yard or they will be donated for another cause. Then later started on the eviction threats and attempts to auction the boat at a public auction. Plaintiffs Eric Watson and Sarah Watson was forced to enter into a written rental agreement on November 17<sup>th</sup>, 2020. Plaintiffs stated there was already a verbal agreement as the boat had been there since June 12<sup>th</sup>, 2020. KJ Roff stated if we did not sign the agreement eviction process would start. In fear, Plaintiff's signed the contract. During this both Plaintiffs asked for work to be done on the boat. KJ Roff was asked for an estimate to have the windows sealed. KJ Roff stated \$3000.00 would cover that. Chrisi Dite stated, while we were prepaying for covered rent, you can not prepay the estimate as there is a hold on the boat and no work (email)can be done on the boat. Plaintiffs asked the reason and Chrisi Dite stated she did not know. The boat has been in the yard for over 18 months and no work has been done on it. They used us for our money and now tell Plaintiffs Eric and Sarah Watson to have the boat removed from their yard as no work will be done on the boat. August 30, 2021, Plaintiffs Eric Watson and Sarah Watson brought

a friend with them to show what was going on. Plaintiffs brought a utility trailer to unload the boat and remove all valuable things in case. Mike Roff stated nothing will be removed from the boat that is not of its original of the boat. Plaintiffs asked why. Mike Roff stated, the boats value would be less and I am trying to get the most out of the boat at the auction. Plaintiff stated this was theft and were told that Plaintiff Eric Watson and his friend could view the boat and take papers and clothing and that was it and leave and the boat is being evicted and have the boat removed in 30 days or it will be sold at an Auction. Plaintiffs left the area and placed a lien on the boat for \$250,000.00 lien on the Boat to protect their investment. Plaintiffs Eric and Sarah Watson protested at a local view point along the highway, posting signs on their Limousine, stating, MIKE ROFF THEIF, KJ ROFF THEIF, REFUSE WORK ON THE BOAT, HAIL MARY, and 1962 Chris Craft Constellation.

### Conclusion

Plaintiffs took there yacht to have it repaired. The excuse from October to present were many lies and excuses. Mike Roff finally stated, on August 30, 2021 no work will be on Plaintiff's boat and Plaintiffs had 30 days to remove it from their property or it will be sold. All of this amounts to hatred towards the Plaintiff's and the Defendants take the law into their own hands by refusing a service to repair the boat as it was brought there for. Theft exists here as the Defendants took the Plaintiffs money for rent. Then if they don't remove the boat the Owners would Auction off the boat. Refusing to allow Plaintiffs to remove items of value off the boat is also theft of property. Extortion is Defendant Mike Roff demanding \$10,000.00, and calling it a deposit. Bad Faith exists here by agreeing for a customer to bring in their boat that is not sea worthy. To allow for no deposit or

Insurance. When the boat arrives the Defendants in BAD FAITH refuse to do any work on the boat. In BAD FAITH demand the Plaintiffs to remove the boat or they would be taken to court and start the eviction process. In Fear the Plaintiffs contacted Associated Boat Transport to find out the cost to transport the boat. Associated Boat Transport stated the cost would be over \$8000.00. Again, this cost would increase repair costs and Plaintiffs finally decided, Plaintiffs Eric and Sarah Watson have done nothing wrong and in GOOD FAITH come to this court to resolve this disagreement. Owners of Latitude Marine Services have lied to us, and acted in BAD FAITH. The Defendants have hired an Attorney to lie to us and steer us in the wrong direction and refuse to bring this issue to the Court. SO, Plaintiff's Eric Watson and Sarah Watson in GOOD FAITH bring this to Court and allow the Jury to decide. Plaintiffs ask for an expedited Jury Trial as Plaintiffs are in fear their boat will be damaged even worse due to the heavy rains and freezes causing more damage to their investment. Plaintiffs requested the Defendants Insurance Company information and are refused by both Defendants and their Lawyer. Plaintiffs believe the Defendants are acting the same way as the case with the homosexuals ordering cakes and flowers for a wedding and refused services. In this case the Defendants refusing to give a factual reason, other than, no work will be done on Plaintiffs boat and to remove the boat or it would be Auctioned off.

V. RELIEF

We pray the Court Orders the Defendant to pay \$1,450,000.00 for this issue and they can keep the boat. Or they can fully restore the boat to its original condition before any

damage took place on the boat. We further demand they refurbish the plumbing to its fully operational capacity. All windows and windshield wipers will be rehabilitated as well as the bright woods be cleaned up. The boat paint will have red oxide from the water line down and white from the water line up. All batteries will be charged and checked for damage or dead and be replaced. All electrical and running gear checked and repaired so the rudders will be fully operational. These were the goals I brought this boat in to have done.

#### VI. CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, We the Plaintiffs certify to the best of our knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of the case.

Done on this 29 day of November, 2021 in the County of Pierce, the City of Graham in the State of Washington.

Eric Watson  
Eric Watson

Eric Watson  
Printed

Sarah Watson  
Sarah Watson

Sarah Watson  
Printed

Eric & Sarah Watson

7807 Kapowsin Hwy E

Graham, WA 98338

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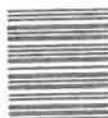
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Tacoma, WA 98402

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